

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DAVID WILLIAMS
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY
(NPMHU/USPS-T1-8)
[ERRATA]**

The United States Postal Service hereby files the revised response of witness David Williams to the above-listed interrogatory of the National Postal Mail Handlers Union dated January 12, 2012. The answer filed on January 25, 2012 responded only to part (a) of the interrogatory. The revised response filed today incorporates that response verbatim and includes the responses to parts (b) and (c). The revised response supersedes the original response. The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

Revised: March 15, 2012

NPMHU/USPS-T1-8

Please describe and provide any supporting documentation for:

- (a) any remedial steps taken by the Postal Service to address any problems or reports of problems referenced in response to Interrogatory NPMHU/USPS-T1-7;
- (b) what steps the Postal Service has taken to anticipate and avoid problems associated with the consolidation of large processing facilities and the attendant substantial increase of incoming and outgoing mail into the remaining facilities; and
- (c) whether those steps are different from the steps taken in the pre-docket consolidations and, if so, how.

RESPONSE

- a. See the response to NPMHU/USPS-T1-7.
- b-c The Postal Service intends to avoid implementing significant consolidation-related operational changes during the peak mailing season to minimize the recurrence of local issues that arose in the scenarios described in NPMHU/USPS-T1-7. Because of the number of consolidations expected to be initiated in conjunction with the initiative under review in this docket, the Postal Service has assembled a cross-functional management team that will be responsible for monitoring implementation, providing guidance, and disseminating information reflecting "best practices" in order to minimize adverse events. The Postal Service has been very successful in implementing facility consolidations associated with its network over the past number of years, including a seamless reduction in the AMC network, many other Area Mail Processing initiatives and the NDC network implementation.